

**PHS Financial Disclosure (Form 4)** (Financial Interests Directly Related to Work under a **Subrecipient Agreement**)

In accordance with the East-West Center Policy on Disclosure of Financial Interests and Management of Conflicts of Interest Related to Public Health Services Sponsored Awards for Research (42 C.F. Part 50, Subpart F and 45 C.F.R., Part 94), investigators from a subrecipient entity that does not have a PHS-compliant policy in effect at the time of PHS award application must disclose their personal significant financial interests (and those of their spouse/registered domestic partner and/or dependent children) related to the work proposed under the relevant subrecipient agreement. This includes the Principal Investigator (PI), Co-Investigators, Senior and Key Personnel, and any other individual who is responsible for the design, conduct, or reporting of research funded by PHS or an agency or organization that follows PHS disclosure requirements.

**Project Information**

EWC PI:	EWC Program:
Subrecipient PI:	Subrecipient Institution:
Project Begin Date:	Project End Date:
Project Title:	
Sponsor: <input type="checkbox"/> NIH <input type="checkbox"/> Other (e.g., PHS, American Heart Association, American Cancer Society): _____	
<input type="checkbox"/> Subcontract of PHS Funds from _____	

**Type of Proposal/Disclosure**

- New Proposal
- Annual Reporting/Non-Competing Continuation
- Renewal/Competing Continuation
- Supplemental Funding Which Includes Time Extension
- No-Cost Time Extension
- New Investigator Added to Project

**Subrecipient Investigator Disclosure**  
For the purpose of this disclosure form, you must report financial interests and travel directly related to work to be performed under the proposed subrecipient agreement.

**1. Publicly Traded Entity**

***Income and Equity Interests***

Have you, your spouse or registered domestic partner, and/or dependent children received income or payment for services in the past 12 months or own equity interest in any publicly traded entity related to your institutional responsibilities exceeding \$5,000 when **aggregated**? This does not include interests in mutual funds and retirement funds in which you do not directly control investment decisions.

- Yes  No

**2. Non-Publicly Traded Entity**

***Income***

Have you, your spouse or registered domestic partner, and/or dependent children received income or other payment for services, in the past 12 months, exceeding \$5,000, when **aggregated**, from any non-publicly traded entity? This does not include payments from the EWC, or income from seminars, lectures, or teaching engagements sponsored by a U.S. federal, state, or local government agency, a U.S. institution of higher education or an affiliated research institute, an academic teaching hospital, or a medical center.

- Yes  No

***Equity Interests***

Do you, your spouse or registered domestic partner, and/or dependent children currently own, or have acquired in the past 12 months, **any** equity interest in any non-publicly traded entity related to your institutional responsibilities? This can include any stock, stock option or other ownership interest.

- Yes  No

**3. Intellectual Property Rights and Interests**

Have you, your spouse or registered domestic partner, and/or dependent children received any payments, in the past 12 months, for any intellectual property rights and interests (e.g. patents, copyrights, assigned or licensed to a party other than the EWC) exceeding \$5,000 related to your institutional responsibilities?

- Yes  No

**4. Travel Reimbursement/Sponsorship**

Have you received **any** travel reimbursement or been sponsored for travel (i.e. travel expenses paid on behalf of Investigator and not reimbursed to Investigator) in excess of \$5,000 per entity in the 12 months prior to disclosure, by any entity related to your institutional responsibilities? This does not include travel sponsored or reimbursed by a U.S. federal, state, or local government agency, a U.S. institution of higher education or an affiliated research institute, an academic teaching hospital, or a medical center.

- Yes  No

**4. Acknowledgment and Certification**

I certify under penalty of perjury that this is a complete disclosure of all my significant financial interests related to my institutional responsibilities and I have used all reasonable diligence in preparing this Financial Interest Disclosure, and to the best of my knowledge it is true and complete. I also acknowledge that by signing my name below that it is my responsibility to disclose, within 30 days, any new significant financial interests obtained during the term of the above proposed project.

Signature of Subrecipient Investigator: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

The information provided herein may be released or transmitted to the sponsor, including federal agency representatives, and according to PHS regulations may be released to the public, upon request. These records will be retained for 3 years after termination of sponsored project or until resolution of any action by the sponsor, whichever is greater.

**Attach additional sheets as required to identify and include financial disclosure information for all project Investigators.**

**PHS Financial Disclosure (Form 4)** (Financial Interests Directly Related to Work under a **Subrecipient Agreement**)

1. For subrecipients of PHS-funded research who follow East-West Center's PHS Conflict of Interest Policy, any person who is named as an investigator, i.e., is responsible for the design, conduct, or reporting of the PHS-funded research project, must submit the PHS Financial Disclosure (Form 4) at the time of application.
2. Conflict of Interest (COI) staff will contact Investigators who have disclosed any significant financial interests (SFI) to request the submission of the PHS Additional Financial Disclosure (Form 2). The COI Designated Official will review Form 2 to determine whether or not the disclosed SFI is related to the research project.
3. The COI Staff will contact the Investigators who have SFI related to the PHS-funded research project to request the submission of PHS Financial Disclosure (Form 3) for Conflict of Interest Committee review.
4. The Conflict of Interest Committee will consider whether the Investigator's SFI could directly and significantly affect the design, conduct, or reporting of the PHS-funded research project. Please allow sufficient time for Committee review.
5. Submission of PHS Financial Disclosure (Form 4) is required (i) on an annual basis for non-competing continuation awards, (ii) when a new Investigator is added to the project, or (iii) when an Investigator's financial interests increase, whichever comes first. It is also required when an Investigator transfers PHS-funded research to the East-West Center.

**Who is considered an "Investigator," and therefore required to disclose?** "Investigator" means the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS (e.g., NIH), or proposed for such funding.

**What is an entity?** *Entity* means any domestic or foreign, public or private, organization (excluding a Federal agency) from which an Investigator (and spouse and dependent children) receives remuneration or in which any person has an ownership or equity interest.

**What is a "Significant Financial Interest"?** A significant financial interest consisting of **one or more** of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities:

1. With regard to **any publicly traded entity**, any income received from entity in 12 months preceding disclosure and value of any equity interests in entity as of date of disclosure exceeding \$5,000 when aggregated for an Investigator, Investigator's spouse, and dependent children from a single Entity (Business, Public or Nonprofit) including salary, consultant payments, honoraria, royalty payments, dividend, loan, or any other payments or consideration with value made during the prior twelve months. Equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;
2. With regard to any **non-publicly traded entity**, any remuneration received from entity in 12 months preceding disclosure, when aggregated, exceeds \$5,000; or when Investigator holds any equity interest (e.g., stock, stock option, or other ownership interest). Exclude income from seminars, lectures, or teaching engagements sponsored by a U.S. Federal, state, or local government agency, a U.S. institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education;
3. Intellectual property interest held by the Investigator, or Investigator's spouse or dependent children on a patent, patent application, or a copyright of software assigned or to be assigned to a party other than the East-West Center upon receipt of income related to such rights and interests that exceed \$5,000 in 12 months preceding disclosure.
4. Any reimbursed or sponsored travel (i.e., that which is paid on behalf of Investigator and not reimbursed to Investigator so that the exact monetary value may not be readily available) in excess of \$5,000 per entity, related to institutional responsibilities. Excludes travel reimbursed or sponsored by a U.S. Federal, state, or local government agency, a U.S. Institution of higher education as defined by 20 U.S.C. 1001(A), an academic teaching hospital, a medical center, or a research institute affiliated with Institution of higher education.

**What is not a "Significant Financial Interest"?** Significant financial interests do **not** include (1) payments made by the East-West Center (salary, royalties, honoraria, expense reimbursement or any other remuneration) or (2) income from seminars, lectures, or teaching engagements sponsored by a U.S. Federal, state, or local government agency, a U.S. institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education or (3) an investment by a mutual fund, pension fund or other investment fund over which the investigator or his/her immediate family member does not exercise management of fund investment.

**Records**

The information provided herein may be released or transmitted to the sponsor, including Federal agency representatives, and according to the PHS regulations, may also be released to the public, upon request. These records will be retained for 3 years after termination of sponsored project or until resolution of any action by the sponsor, whichever is greater.